

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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:
FEDERAL HOUSING FINANCE AGENCY, etc.,
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Plaintiff,
:

v.
:

UBS AMERICAS, INC., et al.,
:

Defendants.
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FEDERAL HOUSING FINANCE AGENCY, etc.,
:

Plaintiff,
:

v.
:

JPMORGAN CHASE & CO., et al.,
:

Defendants.
:
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FEDERAL HOUSING FINANCE AGENCY, etc.,
:

Plaintiff,
:

v.
:

HSBC NORTH AMERICA HOLDINGS, INC., et
al.,
:

Defendants.
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FEDERAL HOUSING FINANCE AGENCY, etc.,
:

Plaintiff,
:

v.
:

BARCLAYS BANK PLC, et al.,
:

Defendants.
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11 Civ. 5201 (DLC)

11 Civ. 6188 (DLC)

11 Civ. 6189 (DLC)

11 Civ. 6190 (DLC)

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:
FEDERAL HOUSING FINANCE AGENCY, etc., :
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Plaintiff, : 11 Civ. 6192 (DLC)
:
v. :
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DEUTSCHE BANK AG, et al., :
:
Defendants. :
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FEDERAL HOUSING FINANCE AGENCY, etc., :
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Plaintiff, : 11 Civ. 6193 (DLC)
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v. :
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FIRST HORIZON NATIONAL CORP., et al., :
:
Defendants. :
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FEDERAL HOUSING FINANCE AGENCY, etc., :
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Plaintiff, : 11 Civ. 6195 (DLC)
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v. :
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BANK OF AMERICA CORP., et al., :
:
Defendants. :
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FEDERAL HOUSING FINANCE AGENCY, etc., :
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Plaintiff, : 11 Civ. 6196 (DLC)
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v. :
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CITIGROUP INC., et al., :
:
Defendants. :
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FEDERAL HOUSING FINANCE AGENCY, etc., :
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Plaintiff, : 11 Civ. 6198 (DLC)
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v. :
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GOLDMAN, SACHS & CO., et al., :
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Defendants. :
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FEDERAL HOUSING FINANCE AGENCY, etc., :
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Plaintiff, : 11 Civ. 6200 (DLC)
:
v. :
:
CREDIT SUISSE HOLDINGS (USA), INC., et al., :
:
Defendants. :
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FEDERAL HOUSING FINANCE AGENCY, etc., :
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Plaintiff, : 11 Civ. 6201 (DLC)
:
v. :
:
NOMURA HOLDING AMERICA, INC., et al., :
:
Defendants. :
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FEDERAL HOUSING FINANCE AGENCY, etc., :
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Plaintiff, : 11 Civ. 6202(DLC)
:
v. :
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MERRILL LYNCH & CO., INC., et al., :
:
Defendants. :
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FEDERAL HOUSING FINANCE AGENCY, etc., :
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Plaintiff, : 11 Civ. 6203 (DLC)
:
v. :
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SG AMERICAS, INC., et al., :
:
Defendants. :
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FEDERAL HOUSING FINANCE AGENCY, etc., :
:
Plaintiff, : 11 Civ. 6739 (DLC)
:
v. :
:
MORGAN STANLEY, et al., :
:
Defendants. :
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FEDERAL HOUSING FINANCE AGENCY, etc., :
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Plaintiff, : 11 Civ. 7010 (DLC)
:
v. :
:
ALLY FINANCIAL INC., et al., :
:
Defendants. :
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FEDERAL HOUSING FINANCE AGENCY, etc., :
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Plaintiff, : 11 Civ. 7048 (DLC)
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v. :
:
GENERAL ELECTRIC COMPANY, et al., :
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Defendants. :
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Pursuant to this Court's Order dated May 15, 2012, in the above-captioned cases, Plaintiff Federal Housing Finance Agency ("Plaintiff"), as Conservator for the Federal National Mortgage Association ("Fannie Mae") and the Federal Home Loan Mortgage Corporation ("Freddie Mac") (together, the "GSEs"), respectfully submits Plaintiff's Proposed Schedule to Amend Complaints.

BACKGROUND

By Order of May 15, 2012, this Court directed counsel for FHFA to propose a schedule to amend its complaints in the fifteen cases before the Court other than the UBS case. FHFA has proposed to file early amendments in such other cases, in advance of any motions to dismiss that may be filed based on residual issues not already decided in the UBS action.¹

PLAINTIFF'S PROPOSED SCHEDULE TO AMEND COMPLAINTS

FHFA hereby proposes the following schedule for amendments:

<u>Case Name</u>	<u>Date of Amended Pleadings</u>
<i>Federal Housing Finance Agency, etc. v. JPMorgan Chase & Co., et al.</i> , 11 Civ. 6188 (DLC)	June 13, 2012
<i>Federal Housing Finance Agency, etc. v. Deutsche Bank AG, et al.</i> , 11 Civ. 6192 (DLC)	June 13, 2012
<i>Federal Housing Finance Agency, etc. v. Goldman, Sachs & Co., et al.</i> , 11 Civ. 6198 (DLC)	June 13, 2012
<i>Federal Housing Finance Agency, etc. v. Merrill Lynch & Co., Inc., et al.</i> , 11 Civ. 6202 (DLC)	June 13, 2012
<i>Federal Housing Finance Agency, etc. v. Morgan Stanley, et al.</i> , 11 Civ. 6739 (DLC)	June 13, 2012

¹ FHFA has requested to reserve the right to amend in response to the motions to dismiss if any genuinely new issues are raised that may be effectively addressed by amendment. (Hearing Tr. 5/14/12, at 10:24-11:2).

<u>Case Name</u>	<u>Date of Amended Pleadings</u>
<i>Federal Housing Finance Agency, etc. v. Ally Financial Inc. et al.</i> , 11 Civ. 7010 (DLC)	June 13, 2012
<i>Federal Housing Finance Agency, etc. v. HSBC North America Holdings, Inc., et al.</i> , 11 Civ. 6189 (DLC)	June 28, 2012
<i>Federal Housing Finance Agency, etc. v. Barclays Bank PLC, et al.</i> , 11 Civ. 6190 (DLC)	June 28, 2012
<i>Federal Housing Finance Agency, etc. v. First Horizon National Corp., et al.</i> , 11 Civ. 6193 (DLC)	June 28, 2012
<i>Federal Housing Finance Agency, etc. v. Bank of America Corp., et al.</i> , 11 Civ. 6195 (DLC)	June 28, 2012
<i>Federal Housing Finance Agency, etc. v. Citigroup Inc., et al.</i> , 11 Civ. 6196 (DLC)	June 28, 2012
<i>Federal Housing Finance Agency, etc. v. Credit Suisse Holdings (USA), Inc., et al.</i> , 11 Civ. 6200 (DLC)	June 28, 2012
<i>Federal Housing Finance Agency, etc. v. Nomura Holding America, Inc., et al.</i> , 11 Civ. 6201 (DLC)	June 28, 2012
<i>Federal Housing Finance Agency, etc. v. SG Americas, Inc., et al.</i> , 11 Civ. 6203 (DLC)	June 28, 2012
<i>Federal Housing Finance Agency, etc. v. General Electric Company, et al.</i> , 11 Civ. 7048 (DLC)	June 28, 2012

CONCLUSION

FHFA respectfully requests that the Court enter Plaintiff's Proposed Schedule For Amending Its Pleadings. FHFA is available at the Court's convenience to further discuss its proposal.

Dated: May 18, 2012
New York, New York

Respectfully submitted,

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